

LOCAL BANKRUPTCY FORM 9013-4

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

TIMI S. WILLS,

CHAPTER 13

CASE NO. 1 - 19 -bk- 01821-HWV

Debtor(s)

U.S. BANK NATIONAL ASSOCIATION, AS
INDENTURE TRUSTEE ON BEHALF OF AND
WITH RESPECT TO BARCLAYS MORTGAGE
TRUST 2021-NPL1, MORTGAGE-BACKED
SECURITIES, SERIES 2021-NPL1,

ADVERSARY NO. - **ap-**
(if applicable)

Plaintiff(s)/Movant(s)

vs.

Nature of Proceeding: LIFT OF STAY

TIMI S. WILLS,

DEBTOR

ESTATE OF OTTIE J. OLNICK,

CO-DEBTOR

JACK N. ZAHAROPOULOS,

Defendant(s)/Respondent(s)

Document #: 80

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

I have prior court hearings scheduled that morning. The rescheduling will give the parties time try to work out a resolution in this matter.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 6/25/2025

/S/ DONALD K. ZAGURSKIE

Attorney for DEBTOR

Name: DONALD K. ZAGURSKIE, Esq.

Phone Number: 717-436-8044

¹ No alterations or interlineations of this document are permitted.